

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONRAI MEMORY LTD.,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-167-ADA

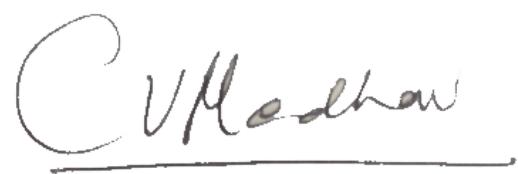
JURY TRIAL DEMANDED

**DECLARATION OF MADHAV CHITLU**

I, Madhav Chitlu, declare and state as follows:

1. I am a memory commodity and supply manager working at Google LLC (“Google”). I have been a Google employee since 2014. My office is in Mountain View, California.
2. I provide this declaration on behalf of Google in support of Defendants’ Opposed Motion To Stay Pending Final Resolution of Plaintiff’s Manufacturer Lawsuits, which seeks to stay portions of the above-captioned action filed by Plaintiff Sonrai Memory Ltd. (“Sonrai”) on February 23, 2021. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.
3. Certain Google Pixel smartphone models use flash memory chips supplied by Kioxia Corporation (“KIC”) (formerly Toshiba Memory Corporation).
4. KIC is the exclusive source and supplier of the Kioxia- or Toshiba-branded flash memory chips for Google’s Pixel smartphones.
5. Google does not have the ability to make any modifications to the circuits in KIC’s supplied flash memory chips and instead integrates those chips into Google Pixel smartphones “as is” with respect to their circuit designs.
6. Google does not have technical documentation concerning, or employees knowledgeable of, factual information showing in detail the design or manufacture of the accused circuitry of the flash memory chips supplied by KIC.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on December 16, 2021, in Fremont, California.



A handwritten signature in black ink, appearing to read "C V Madhav". The signature is fluid and cursive, with a horizontal line underneath it.

---

Madhav Chitlu